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MEMBER ORGANIZATIONS

American Association of State Highway and Transportation Officials
American Radio Relay League
American Red Cross
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International Association of Emergency Managers
International Association of Fire Chiefs
International Association of Fish and Wildlife Agencies
International Municipal Signal Association
National Association of State Emergency Medical Services Directors
National Association of State Foresters
National Association of State Telecommunications Directors

LIAISON ORGANIZATIONS

Federal Communications Commission
Federal Partnership for Interoperable Communications
Telecommunications Industry Assn
U.S. Dept. of Agriculture
U.S. Dept. of Justice
CommTech Program
U.S. Dept. of Homeland Security
FEMA
Safecom Program
U.S. Department of Interior

September 28, 2004

Mr. John Muleta
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket 03-264

Dear Chief Muleta:

NPSTC supports conformance of the station ID rules at 700 MHz with those used at 800 MHz. Current rules for the 800 MHz band provide licensees with exclusive channels the option of using a digital station ID, however this option is not addressed in the rules for the 700 MHz band.

Section 90.647(c) of the rules states that stations licensed on an exclusive basis, and which normally employ digital signals for the transmission of data, text, control codes, or digitized voice may be identified by digital transmission of the call sign. Upon request, licensees employing this option must provide the Commission with information sufficient to decode the digital call sign. These rules were originally adopted in 1993 prior to the 700 MHz band allocation, and have been successfully applied in the 800 MHz and 900 MHz bands. NPSTC believes they should apply equally to the 700 MHz band.

One of the key factors considered in choosing 700 MHz band spectrum for public safety was its proximity to the 800 MHz band. This established the potential for public safety licensees to purchase one radio which would cover both the 700 and 800 MHz bands. The Commission also adopted rules requiring that equipment for the new 700 MHz band be operated primarily in the digital mode. Multiple manufacturers have responded and are offering public safety digital equipment which covers both the 700 MHz and 800 MHz bands. Therefore, we believe conforming the rules for 700 MHz station ID's to those applicable to the 800 MHz band would be beneficial for both public safety licensees and equipment manufacturers.

This issue has been raised in comments of other parties to the Biennial Review proceeding referenced above. A stated goal of this Biennial Review is to identify ways to streamline the Commission rules. We believe this issue is just the type of rule which falls well within that goal, is non-controversial and could be clarified or corrected as needed with minimal delay. The action we request merely adds an option to use a digital station ID in the 700 MHz band. It does not eliminate the current option allowing 700 MHz licensees to use an analog or morse code ID if they desire to do so.

If the resolution of the entire Biennial review includes other issues which are more controversial, we request that the Commission treat conformance of the ID rules at 700 MHz to those at 800 MHz as a correction of the rules through an errata. Had the 700 MHz rulemakings not involved so many other complex issues, we believe it is likely that the minor changes to section 90.647 necessary to allow either an analog or digital station ID at 700 MHz would have been made as part of the original proceedings.

Sincerely,

Marilyn Ward, Chair
National Public Safety Telecommunications Council

CC: Michael Wilhelm
Jeannie A. Benfaida